

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KEWAZINGA CORP.,)	
)	
Plaintiff,)	
)	Civil Action No. 1:18-cv-4500-GHW
vs.)	
)	
)	
MICROSOFT CORPORATION,)	
)	
Defendant.)	

**DECLARATION OF KEITH HANNA, D.PHIL., IN SUPPORT OF
KEWAZINGA'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Keith Hanna, hereby declare that:

1. I have been retained by Kewazinga Corp. ("Kewazinga") to serve as an expert in the above-captioned case. I make this declaration to offer my opinions regarding the interpretation of certain language in the claims of Kewazinga's U.S. Patent Nos. 9,055,234 ("the '234 patent"), 6,522,325 ("the '325 patent"), and 6,535,226 ("the '226 patent"; collectively with the '234 and '325 patents, "the Asserted Patents").

2. This declaration is based upon information currently known to me, and I reserve the right to rely upon any additional information I become aware of after the date of this declaration and to respond to any arguments or opinions regarding the subject matter of my declaration raised by Microsoft Corporation ("Microsoft") or its experts after the date of this declaration, including at trial.

I. PROFESSIONAL BACKGROUND AND QUALIFICATIONS

3. I am the founder and CEO of IPRD Group, a consulting firm that specializes in the global deployment of transformative technologies by bridging the gap between advanced research and commercialization in the data and imaging sciences.

4. I received a D.Phil. in Computer Vision, Robotics Research Group, from Oxford University (1990) and a B.A. in Engineering Sciences from Oxford University (1986).

5. I have more than 20 years' experience leading advanced computer vision and engineering solution R&D initiatives and transitioning them to deployment or commercialization. I am highly experienced in world-class R&D environments and commercial startup environments, serving both commercial, non-profit, and Government clients, and have been the founder of several successful startup organizations.

6. Some highlights of my professional experience include the following:

- Group Head, Vision Systems, SRI International Sarnoff, attracting and managing \$10-15m annual revenue from US Government and commercial sources, and managing up to 30+ member cross-company and cross-disciplinary teams
- Over 25 publications and 70 issued patents
- Pioneer in areas including model-based motion, ego-motion recovery, autonomous navigation, obstacle avoidance, and iris recognition
- Most Influential Paper over the Decade Award, 2007, from the International Association of Pattern Recognition
- Founder and CEO of IPRD Group
- Founder and CTO of EyeLock Corporation (a biometric technology company, in which a controlling share was acquired by publicly-traded VOXX International Corporation)
- Founded / led the development and deployment of many vision systems now deployed at scale worldwide, including: iris recognition on Samsung mobile devices, video insertion, traffic monitoring systems, video surveillance

prosecution of the Asserted Patents or the decision to incorporate my patent by reference in the '325 and '234 patents. The process described in U.S. Pat. No. 5,259,040 recovers a depth/range image with each pixel representing the range of the pixel in one image. A person of ordinary skill in the art would know that, given a single image, a co-registered range map, camera intrinsic parameters (e.g. focal length), and an arbitrary set of synthetic camera extrinsic parameters that represent movement (e.g. translation, rotation) from the position of the camera from which the single image was acquired, the pixels can be warped to generate tweened imagery. Tweening, however, is not limited to the specific example in my patent. A person of ordinary skill in the art would recognize that it applies to other techniques for generating synthetic imagery from acquired imagery to show movement and transition between the acquired imagery, as mentioned in the definitions above.

III. LEVEL OF ORDINARY SKILL IN THE ART

23. Based on my experience, it is my opinion that a person of ordinary skill in the art of the Asserted Patents at the time each was filed would have a bachelor's degree in computer science, computer engineering or the equivalent, and 3-5 years of experience in the field of computer vision or image processing, or a post-graduate degree in computer science, computer engineering or the equivalent, and 1-2 years of experience in the field of computer vision or image processing, or equivalent experience.

IV. CLAIM CONSTRUCTION AND ANALYSIS

24. I have been asked to review certain claim terms present in the Asserted Patents and provide my opinion regarding how a person of ordinary skill in the art would understand these terms.